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Lead Counsel for the Direct Purchaser Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 07-5944-SC

MDL No. 1917

This Document Relates To:

*Crago, d/b/a Dash Computers, Inc., et al. v.
Mitsubishi Electric Corporation, et al., Case
No. 14-CV-2058 (SC).*

**DECLARATION OF R. ALEXANDER
SAVERI IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO SEAL
DOCUMENTS PURSUANT TO CIVIL
LOCAL RULES 7-11 AND 79-5(d)**

1 I, R. ALEXANDER SAVERI, declare as follows:

2 1. I am a member in good standing of the State Bar of California and the managing
3 partner at the law firm, Saveri & Saveri, Inc., Lead Counsel for the Direct Purchaser Plaintiffs in *In*
4 *re Cathode Ray Tube (CRT) Antitrust Litigation*, MDL No. 1917. I make this declaration, except
5 where noted, of my own personal knowledge, and, if called upon to do so, I could and would testify
6 competently to the facts contained herein.

7 2. I submit this Declaration in support of Plaintiffs' motion to file portions of the
8 following document under seal pursuant to Civil Local Rules 7-11 and 79-5(d):

9 **• SECOND AMENDED DIRECT PURCHASER PLAINTIFFS' CLASS**
10 **ACTION COMPLAINT AGAINST MITSUBISHI AND THOMSON**

11 3. On June 18, 2008, the Court approved a "Stipulated Protective Order" ("Protective
12 Order") in *In re Cathode Ray Tube (CRT) Antitrust Litigation*, MDL No. 1917 (Dkt. No. 306).

13 4. Section 10 of the Protective Order requires that "a Party may not file in the public
14 record in this action any Protected Material. A Party that seeks to file under seal any Protected
15 Material must comply with Civil Local Rule 79-5."

16 5. Plaintiffs seek to file portions of the document listed above in Paragraph 2 under
17 seal pursuant to the above referenced Protective Order.

18 6. The portions of the document identified in Paragraph 2 have been designated as
19 confidential by Defendants in *In re Cathode Ray Tube (CRT) Antitrust Litigation*, MDL No. 1917,
20 i.e., the following entities:

21 Beijing Matsushita Color CRT Co., LTD; Chunghwa Picture Tubes (Malaysia);
22 Chunghwa Picture Tubes, LTD; Hitachi America Ltd.; Hitachi Asia, Ltd.; Hitachi
23 Displays Corporation; Hitachi Displays, Ltd.; Hitachi Electronic Devices (USA),
24 Inc.; Hitachi Ltd.; Irico Display Devices Co. LTD; Irico Group Corporation; Irico
25 Group Electronics Co., Ltd.; Koninklijke Philips N.V.; LG Electronics Taiwan
26 Taipei Co., Ltd; LG Electronics USA, Inc.; LG Electronics, Inc.; LP Displays
27 International Ltd.; MT Picture Display Co., LTD; Panasonic Corporation; Panasonic
28 Corporation of North America; Philips Electronics Industries (Taiwan), Ltd.; Philips
Electronics North America Corporation; Philips de Amazonia Industria Electronica
Ltda.; Samsung SDI (Malaysia) SDN.BHD; Samsung SDI America, Inc.; Sasung
SDI Brazil LTDA; Samsung SDI Co., Ltd.; Samsung SDI Mexico S.A. de C.V.;
Samtel Color Ltd.; Shenzhen SEG Hitachi Color Display Devices, Ltd.; Shenzhen

1 Samsung SDI Co., Ltd.; Tatung Company of America, Inc.; Thai CRT Co., LTD;
2 Tianjin Samsung SDI Co., Ltd.; Toshiba America Consumer Products, LLC;
3 Toshiba America Electronic Components, Inc.; Toshiba America Information
Systems, Inc.; Toshiba America, Inc.; Toshiba Corporation; and Koninklijke Philips
Electronics N.V.

4 This declaration, the accompanying administrative motion, and the redacted and unredacted
5 versions of the Second Amended Complaint will be served on all Defendants in MDL No. 1917.

6 7. A stipulation by the parties could not be obtained because under Civil Local Rule
7 79-5, parties may not stipulate to the filing of any document under seal. *See* Civil L.R. 7-11(a), 79-
8 5(a).

9 I declare under penalty of perjury under the laws of the United States of America that the
10 foregoing is true and correct. Executed on August 6, 2015 in San Francisco, California.

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12 /s/ R. Alexander Saveri

13 R. Alexander Saveri
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